IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Edward Stewart

vs.

Civil Action

David Feldman, et al.

MEMORANDUM OF LAW

Plaintiff Edward Stewart asks for leave to file a reply brief in support of his motion for sanctions and requesting related relief. Earlier, Plaintiff filed a motion for sanctions for Defendants' failure to timely produce documents. This Court gave Defendants additional time to produce the requested documents. They have now produced at least some additional documents. The Reply Brief is necessary to update this Court as to the status of Defendants' production. It further is necessary to explain Plaintiff's updated requests for relief based on Defendants' production.

Plaintiff asks to file the new brief only to address Defendants' production and the related arguments that Defendants now raise. That justifies leave to file a reply brief under § II(B)(3) of this Court's Policies and Procedures.

Respectfully submitted,

/s/ Daniel J. Auerbach

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